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-46469 (Rev. 9/98)

December 15, 1998

98-RF-05996

Distribution

TRANSMITTAL OF CONDUCT OF OPERATIONS IMPLEMENTATION ASSESSMENT FOR BUILDING 374 (NTS-RFO-KHLL-3710PS-1998-0003, TASK 4A-1), ASSESSMENT NO. 99-0039-RMRS, REVISION 0 – JWP-076-98

#### **PURPOSE**

The purpose of this correspondence is to forward documentation regarding the above assessment.

#### DISCUSSION

Attached is the Conduct of Operations Implementation Assessment for Building 374, Assessment No. 99-0039-RMRS, Revision 0. This Assessment was conducted in response to Corrective Action Plan for Event Investigation for the Building 374 Acid Spill on Dock 8 (NTS-RFO-KHLL-371OPS-1998-0003, Task 4a-1), October 5, 1998.

## RESPONSE REQUIREMENTS

None required. If you have any questions in regard to this matter or require any additional information, please contact me at extension 7678.

/James W. Patterson

Vice President Technical Support

LCR:alk

Attachment: As Stated

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ADMIN RECORD

SW-A -002867

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# Status Revision/Completion Form

Page: 1 of 1 12/14/98 02:43PM

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Ref ID No.: NTS-RFOKHL	L-371OPS-1998-0003	Ident Process	Prefix: CINT Cd/Origin: PAAA/NTS	
TYPE OF CHANGE       1. Action         3. Plan M       5. Cance	n Plan Due Date Change Manager Change	2. Task D 4. Task M <b>X</b> 6. Task G	ue Date Change anager Change ertificate of Completion	
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TASK MANAGER				
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Current Organization:CPIR310			VHEELER, MARTIN	
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Assessment No: 99-0039-RMRS

Date: December 14, 1998

# Assessment Technical Support

# Conduct of Operations Implementation - Building 374

(NTS-RFO--KHLL-371OPS-1998-0003, Task 4a-1)

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Date: 12/14/98

# **Assessment**

Title:	Assessment No. :			
Assessment				
Conduct of Operations Implementation'	99-0039-RMRS			
– Building 374				
(NTS-RFOKHLL-371OPS-1998-0003, Task 4a-1)				
	Initial Issue Date:			
	December 14, 1998			
Authors: G. L. Fischer, C. M. McConville, L. C. Rock, M. D. Thornton	Revision No. : 0			
Performing Organizations: RMRS Technical Support & SSOC 371/374 Ops	Revision Date: N/A			
DISTRIBUTION: Original: Vice President, RMRS Technical Support				
Copies: K-H Independent Safety Oversight, hardcopy and electronic (required) Director, K-H Engineering & Integration Project Manager, SSOC 371/374 Project Facility Manager, SSOC 371/374 Operations Director, RMRS Nuclear Safety Vice President, RMRS Waste Operations Manager, RMRS Water Operations Technical Manager, RMRS B374 (WC&T) Director, RMRS Compliance				
Assessment Performed by:    12-14-98   Date				
Date 12/14/98  Date 12/14/98  Date 12-15-98				
Reviewed by:    To Guerled   12/14/98     Date     Date				

# INTRODUCTION

The purpose of this assessment was to evaluate the implementation status of Building 374 Conduct of Operations (COOP) implementation. This assessment was conducted per Corrective Action Plan, Building 374 Acid Spill on Dock 8 – NTS-RFO-KHLL-371OPS-1998-0003, Action # 4a-2, dated 10/5/98.

Building 374 is a joint tenancy facility with Safe Sites of Colorado (SSOC) responsible for maintaining the building safety envelope, including radiological controls, (owner), and Rocky Mountain Remediation Services' (RMRS) responsible for liquid waste treatment operations (tenant). A Memorandum of Understanding, signed 2/26/97, between the two organizations establishes the responsibilities and authority for each organization. Building 371/374 Operations has issued a COOP Matrix of Applicability, which delineates the documentation and method used in implementing each portion of COOP. Liquid Waste Operations (LWO) has issued a similar Matrix but only to describe its documentation and method used in implementing COOP outside the walls, (valve vaults, etc.), of Building 374.

The above information was used as the basis for questions, document reviews, record examination and observations made by this assessment team.

This assessment addresses conduct of operations adherence, with specific emphasis on conduct of operations implementation in the areas of alarm response, change control, procedure compliance, and organizational responsibility.

# **CONCLUSION**

The overall result of this assessment is that the conduct of operations implementation is satisfactory in Building 374. This result is based on the findings related to the objectives detailed in the checklist below. Two deficiencies are identified, see #7 and 25 below. Also one noteworthy practice, (# 11), and four observations are identified, see #s 5, 7, 14 and 15.

The results of this assessment lead to the conclusion that it is unlikely a similar incident to the Building 374 acid spill on Dock 8 could occur given the current COOP implementation status, based on the answers to the questions below. Specifically, COOP configuration control requirements are being met and communications have improved since the acid spill occurrence.

# ASSESSMENT PROCESS

# **Assessment Process:**

The following checklist was developed and used for the interview of both Building 371 operations management (SSOC), and Building 374 Liquid Waste Operations process personnel (RMRS). Additionally, the assessment process included a tour, walkdown and observations of

the Building 374 process operations area. Various documents and records pertaining to facility operations were reviewed.

#### **Checklist Items and Results:**

1. Verify that there is an approved Conduct of Operations implementation plan/applicability matrix in accordance with new Site Conduct of Operations Manual, MAN-66-COOP, effective 9/15/98.

**COOP Reference: Section 1D** 

# Response:

Building 371 Facility Management (SSOC) has developed a *Rocky Flats Graded Approach Matrix of Applicability for Building 371/374*, 9/1/98, that lists the facility implementing procedures (operations orders) for applicable sections of COOP. The majority of the COOP implementation operations orders are applicable to both Building 371 and 374.

2. Verify Conduct of Operations has been established and enforced by SSOC in Building 374 in accordance with Memorandum of Understanding for Owner/Tenant Responsibilities in the Building 371/374 Complex – SMS-030-97, dated 2/26/97, and the new Site Conduct of Operations Manual, MAN-66-COOP, effective 9/15/98.

COOP Reference: Sections 1D, 2

# Response:

The Memorandum of Understanding states that the complex owner is responsible for "establishing and enforcing applicable standards for Conduct of Operations". SSOC has established a *Building 371/374 Basis for Interim Operations*, 9/10/97, Rev. 2, (BIO), and several operations orders that implement specific sections of COOP. The BIO and operations orders are followed by both Building 371 and 374 personnel.

3. Verify RMRS as Tenant, according to Memorandum of Understanding for Owner/Tenant Responsibilities in the Building 371/374 Complex – SMS-030-97, dated 2/26/97, has obtained approval for changing conditions/systems by SSOC.

**COOP Reference: Section 7B** 

#### Response:

If RMRS requires a modification to any system, structure, or component in Building 374, a Work Control Form documenting the modification request is submitted to the Building 371 Shift Manager. A work package is then developed by SSOC in accordance with IWCP. The work package is reviewed by SSOC personnel who ensure the work package addresses the updating of drawings and documents when necessary (e.g., a Baseline Document Change Form is completed). There are problems with some systems not matching drawings, but since the Building 371/374 BIO was implemented in August 1998, configuration management is now an administrative control and has become a priority.

4. Verify Temporary Modification Control requirements have been met, with particular interest in verifying modification control takes place prior to modified use of systems or components. **COOP Reference: Section 4F** 

# Response:

Interviews conducted and documents researched indicate that modifications are requested and carried out within the requirements of COOP section 4,F. The Temporary Modification Log is readily available and contains necessary information documenting system changes.

5. Verify that personnel have documented evidence of required training.

**COOP Reference: Section 6C** 

# Response:

A List of Qualified Individuals (LOQI) for RMRS Liquid Waste Operations personnel is available in Building 374, located in the Secretary's office of the Building 374 Technical Manager. The LOQI appeared to be current except for Section 5 that identifies responsible RMRS individuals to act as qualification authority, dated 1996 which should be updated to reflect the current Company organization.

Other useful training data was also available. Building 374 maintains a listing of *Liquid Waste Operations* – 374 *Individual Training by Shift*, located on the Operations Board in Room 3181 – Liquid Waste Control Room. This list was dated 10/20/98. Another list was also available on the Operations Board, Room 3181 that identifies Liquid Waste Operations employees by group/organization attending classes during the current month. Both these documents are over and above the LOQI and appear to be useful tools.

#### Observation:

There is no specific required training for the Building 374 Liquid Waste Operations salaried personnel. Specifically, the Building 374 Liquid Waste Operations Technical Manager, Ty Vess, is required to complete the RMRS Manager's Qualification Program required for all RMRS managers. A position description, (for job posting purposes), was recently developed for Mr. Vess' position. However, the Technical Manager functions are very similar to those of a facility manager, but there is no formal training or qualification package specific to those functions.

6. Verify that activities are controlled by procedures/documents.

**COOP Reference: Section 5C** 

# Response:

Through reviews of Building 371/374 operations orders, alarm response procedure, other operating procedures, and personnel interviews, it is apparent activities are controlled as required by COOP.

7. Has the procedure change control processes required by Site Document Requirements Manual, MAN-001-SDRM, and Operations Order: Procedure Changes Affecting Quality, OO-371/374-163, been followed as specified in the Rocky Flats Graded Approach Matrix of Applicability for Building 371/374, 9/1/98? Are procedures changed whenever a system or process is modified?

**COOP** Reference: Section 7B

# Response:

Procedure change requirements for Building 374 are confusing. One set of requirements and format are being followed for RMRS procedures (those which do not interface with Building 371 operations) and another set for those which do. The appropriate personnel from Building 374 Liquid Waste Operations are reviewing these procedures; however, the review process being performed on the procedures does not follow RMRS procedural requirements.

The point of contact for Building 374 Liquid Waste Operations procedures was interviewed and was knowledgeable of the procedure change requirements specified by SSOC, RMRS, and MAN-001-SDRM, but did express concern over the process.

All personnel interviewed were very knowledgeable of the process to follow if a procedure cannot be followed as written, but could not describe the procedure change process.

# **Deficiency:**

RMRS procedures for Building 374 are being written by RMRS personnel but they are being reviewed under SSOC procedures. This practice is utilized due to SSOC personnel being more aware of authorization basis (BIO) issues and the Facility than RMRS personnel; however, RMRS procedural requirements, (RMRS safety screens and Operations Review Committee program requirements), are not being followed.

#### Observation:

Only one person, (the point of contact for Building 374 Liquid Waste Operations procedures), in Building 374 is knowledgeable with all procedure handling requirements invoked by the RMRS and SSOC interface, and their respective procedure development and approval requirements. Should this person be unavailable, there may be unnecessary delays encountered in procedure processing.

8. Verify lessons learned from similar projects have been reviewed for applicability.

**COOP Reference: Section 6D** 

# Response:

There was a Lessons Learned notebook available in Building 374, Room 3181 – Liquid Waste Control Room. In it were recent lessons learned write-ups including *High-Level Alarm Not Resolved for an Extended Period*, RM-98-116.IO, 11/4/98, which covered the Building 374 Acid Spill incident, and a similar one at Hanford, regarding the Pacific Northwest Laboratory, *Laboratory Vacuum System Criticality Slab Tank* incident, (NTS-RL-PNL-325-1995-001). This Lessons Learned write-up was developed per the *Corrective Action Plan For Event Investigation, Building 374 Acid Spill on Dock 8*, dated 10/5/98.

9. Verify that personnel are familiar with immediate actions to be taken in response to unusual indications and alarms.

**COOP Reference: Section 7J** 

#### Response:

Interview with 374 Operations Foreman confirmed that control room personnel refer to the Building 374 Alarm Response Procedure (ARP) when an alarm is received. The Building

374 ARP was recently approved and implemented. The format is the same as that used in the Building 371 Control Room.

10. Verify there is a contingency plan to address unanticipated hazards.

**COOP Reference: Section 4E** 

# Response:

All incidents involving unanticipated hazards are handled through immediate notification to the Building 371/374 Shift Manager's Office. The On Duty Shift Manager follows the protocol established through the Building 371/374 Emergency Response Operations (BERO) procedure, which was verified to be a controlled copy and is current.

Also, Buildings 371/374 has an Emergency Preparedeness Hazards Assessment, which is updated annually. This assessment is located in the Building 371/374 Facility Manager's office. The procedure, *Emergency Class and Protective Actions*, PRO-T56-EP-04.00, 9/22/98, is available in the Building 371/374 Shift Manager's office. This document includes the Emergency Action Levels identified in the Building 371/374 hazards assessment.

Building 374 Liquid Waste Operations also follows Notification, Response, Investigation, and Reporting of Compliance and Safety Events, RMRS INSTR.001, 3/27/98.

11. Verify the implementation of Integrated Safety Management (ISM).

**COOP Reference: Section 4A** 

#### Response:

Procedures and processes for Liquid Waste Operations in Building 374 are developed and implemented following the core functions and principals of ISM. Through interviews with management, supervisors, operators, and the procedure writer, procedures are being written with the help and input of the operators and that input is being used to write these procedures. Building 374 Liquid Waste Operations personnel are currently doing a very good job of seeking operators' and supervisors' input and feedback resulting in procedures and processes that are safe and effective.

#### **Noteworthy Practice:**

This observation applies to Questions 11 and 12. Building 374 Liquid Waste Operations management is currently doing an exceptional job of implementing ISM. Operators appear comfortable providing input to supervision and management, knowing they are being listened to and their input is being used. Building 374 Liquid Waste Operations at all levels is to be commended for their support of ISM.

12. Verify that quality assurance was involved in project planning through execution.

**COOP Reference: Section 4** 

# Response:

Since Building 374 Liquid Waste Operations uses the Technical Writer and Operators so well in developing procedures, QA, Safety, and Radiation Operations are not brought in until procedures and activities are close to being finalized. This is a good utilization of limited

resources in the area, since QA, Safety, RO are covering other areas in Building 371 thus reviewing a procedure at final stages requires less of their time.

13. Verify communication is established between Building 371 and Building 374 on change control and organizational responsibilities.

**COOP Reference: Section 5F** 

# Response:

Observations of written and oral communication practices indicate that it follows the applicable COOP references, requirements and standards. (Hand communication is not used; instead the group uses radio or telephone communication.)

It is apparent through interviews with both Building 371 Operations and Building 374 Liquid Waste Operations personnel that open lines of communication exist.

14. Verify logs and records accurately define events are compatible and cohesive.

**COOP Reference: Section 5G** 

# Response:

Logs are controlled by operations orders and maintained as required by those orders. The operations orders utilized in Building 371/374 identify all required logs, however, there is no single listing of all the required logs within any one operations order.

#### **Observation:**

It is recommended the new COOP Operation Order under development by Building 371/374 Operations be finalized and implemented to include a single list of required logs.

15. Verify there is a process to document and resolve deficiencies.

**COOP Reference: Section 5H** 

# Response:

The current Building 374 Technical Manager maintains an informal action list. Occurrences are handled and reported through Building 371/374 Shift Manager's Office. Building 371/374 Operations coordinates issue submittals into the *Plant Action Tracking System* (PATS). Building 374 Liquid Waste Operations personnel work PATS issues through Building 371/374 Operations PATS representative. Facility or program deficiencies not identified in PATS are addressed through either the initiation of an Integrated Work Control Program (IWCP) work package, or a BIO Administrative Control Deviation Tracking form is issued through the appropriate program organization under Building 371/374 Operations.

#### Observation:

Building 374 Liquid Waste Operations should consider maintaining an RMRS deficiency log to track their deficiencies' status through completion. This practice is utilized by other RMRS facility operations and is a good business practice.

16. Verify work-planning documents/basis of estimate correctly identified magnitude of hazards and level of authorization basis.

**COOP Reference: Section 4** 

# Response:

Work planning documents clearly identify the magnitude of hazards and the appropriate level of Authorization Basis.

17. Verify personnel with stop work authority are identified.

**COOP Reference: Section 4A** 

# Response:

Interviews conducted and documents reviewed during this assessment verify that all personnel have stop work authority.

18. Verify resource allocation has been established.

**COOP Reference: Section 2** 

# Response:

Building 371/374 Basis for Interim Operations (BIO), 9/10/97, Rev. 2, identifies key positions for conducting facility operations, e.g., shift manager, shift technical advisor, radiation control technician must be available 24 hours/day. (Per the BIO, there are no specific Building 374 personnel required.) However, Building 374 Liquid Waste Operations has identified a minimum number of required positions based on two JCUSC corrective actions, (copies of JCUSC forms and resolution documentation were provided to Assessment Team).

19. Verify Lockout/Tagout and Caution Tag processes meet the requirements of *Lockout/Tagout*, HSP 02.08, and the Operations Order: *Lockout/Tagout*, OO-371/374-01, as specified in the 371/374 Applicability Matrix.

**COOP Reference: Section 7D** 

# Response:

A separate Lockout/Tagout (LO/TO) system and logbook are used by personnel in Building 374 Liquid Waste Operations for systems not interfacing with Building 371 operations. This system, including Caution Tag usage, is utilized in accordance with requirements of the above mentioned procedures.

20. Verify that preparations are completed for response to potential radiological problems/spills.

**COOP Reference: Section 4E** 

Response: Satisfactory.

See # 10 above.

21. Verify that contamination control schemes for surface and airborne radioactive contamination are sufficient for planned activities.

**COOP Reference: Section 2J** 

#### Response:

Contamination controls are identified through procedures implemented by Building 374 Liquid Waste Operations. Building 374 Liquid Waste Operations, as a line organization, is responsible for all contamination controls for their operations. Radiological Operations are involved in Building 374 procedural development, attend Building 374 pre-evolution briefings, and ensure compliance with radiological controls during 374 operations as

required. Building 374 foremen have direct contact with Radiological Operations when necessary.

22. Verify there is a direct and open means of relating safety problems and concerns.

**COOP Reference: Section 4C** 

# Response:

Based on interviews, Building 374 Liquid Waste Operations is doing an exceptional job of maintaining open communications with all personnel. As stated in Question 11, Building 374 Liquid Waste Operations is doing an exceptional job of implementing ISM.

23. Verify that emergency response actions have been established.

**COOP Reference: Section 4E** 

Response:

See # 10 above.

24. Verify Alarm Deactivation Request (ADR) logs are kept in accordance with COOP.

COOP Reference: Section 7L

# Response:

Review of Building 371 and 374 Deactivated Alarm Logs confirmed that SSOC tracks ADRs performed for Building 374 Utility systems, and RMRS tracks ADRs performed for Building 374 Process systems.

25. Verify operator aids are developed and posted in accordance with COOP.

**COOP Reference: Section 5E** 

# Response:

Per the Rocky Flats Graded Approach Matrix of Applicability for Building 371/374, 9/1/98, the implementation of Operator Aids is directly out of COOP. As it turns out the Lockout/Tagout operations order defines how this section is implemented and what exceptions to COOP are taken. Operator Aids are used throughout the facility. In Building 374, an Operator Aid may be generated and approved by the Building 371/374 Facility Manager or the 374 Process Lead. Operator Aids for process operations are routed through the Building 374 Process Lead, whereas Operator Aids for building or utility purposes are routed through the Building 371/374 Facility Manager. Although there seems to be a possibility of confusion, the two organizations seem to be in control overall.

#### Deficiency:

Not all Operator Aids are approved. Implementation is not in accordance with current *Rocky Flats Graded Approach Matrix of Applicability for Building 371/374*, 9/1/98.

#### **Assessment Information:**

The assessment was conducted on December 9th-11th, 1998

# **Documentation Reviewed During Assessment:**

Building 374 Acid Spill on Dock 8 Final Report, 8/10/98 12/14/98 2:33 PM

Assessment, Technical Support, Conduct of Operations Implementation – Building 374 (NTS-RFO--KHLL-3710PS-1998-0003, Task 4a-1) Assessment No: 99-0039-RMRS, Final, Revision 0

Corrective Action Plan, Building 374 Acid Spill on Dock 8 – NTS-RFO-KHLL-371OPS-1998-0003, Action # 4a-2, 10/5/98

Memorandum of Understanding for Buildings 371/374 Owner/Tenant Responsibilities SMS-030-97, 2/26/97

Site Conduct of Operations Manual, MAN-006-COOP, Revision 0, 9/15/98

Site Integrated Work Control Package Manual, Revision 0, 9/15/98

Development, Use and Control of List of Qualified Individuals (LOQI), RMRS INST.004, Revision 2, 9/15/98

List of Qualified Individuals (LOQI) for Building 374 Liquid Waste Operations Personnel Listing: RMRS Building 374 Liquid Waste Operations employees by group/organization attending classes during the current month

Building 371/374 Basis for Interim Operations, Revision 2, 9/10/97

Liquid Waste Operations – 374 Individual Training by Shift, 10/20/98

Site Document Requirements Manual, MAN-001-SDRM, Revision 2, 8/30/98

SSOC Operations Order: Procedure Changes Affecting Quality, OO-371/374-163

RFETS Lessons Learned: *High-Level Alarm Not Resolved for an Extended Period*, RM-98-116.IO, 11-3 SD-98-3826, 11/4/98

Emergency Class and Protective Actions, PRO-T56-EP-04.00, 9/22/98

Notification, Response, Investigation, and Reporting of Compliance and Safety Events, RMRS INSTR.001, Revision 1, 3/27/98

Building 371/374 Emergency Response Operations (BERO), 3-V58-BERO-14.371/374, Revision 0, 8/20/98.

Alarm Response Building 374, RMRS/OPS-PRO.089, Rev. 0, 11/24/98

Building 374 Emergency Preparedness Hazards Assessment, Revision 0, 9/10/97

Building 371 Facility Emergency Preparedness Hazards Assessment, Revision 1, 6/9/98

JCUSC Concern forms regarding insufficient staffing levels in Building 374, 6/2/86, Case # 86-125; and 8/12/98, Case # 014-96

Letter from N. P. Cypher to Distribution, 8/16/96, Subject: Resource Staffing of Building 374 – NPC-014-96

Letter from W. D. Stenson and T. J. Tegler to Distribution, 8/20/96, Subject: Adjustment to Safety Concern Resolution: 86-125 – Resource Staffing of Building 374

Emergency Class and Protective Actions, PRO-T56-EP-04.00, 9/22/98

Building 371 and Deactivated Alarm Log

Building 374 Deactivated Alarm Log

Building 374 Lockout/Tagout Log

Building 374 Operator Aid Log

Building 374 Control Room Log

Building 371/374 Shift Manager Log

Building 371/374 Shift Technical Advisor Log

Rocky Flats Graded Approach Matrix of Applicability for Building 371/374, 9/1/98

Rocky Flats Graded Approach Matrix of Applicability for [RMRS] Water Treatment Activities (WC&T, B995, ER), Final Draft, not dated

Organization Charts for SSOC Building 371/374 Project Management (no date), and RMRS Water Operations, 12/7/98

Procedure and Document Control, RMRS OPS-DIR-004, Revision 1, 4/30/98

Assessment, Technical Support, Conduct of Operations Implementation – Building 374 (NTS-RFO--KHLL-3710PS-1998-0003, Task 4a-1) Assessment No: 99-0039-RMRS, Final, Revision 0

Operations Review Committee Instruction, RMRS OPS-INST.007, Revision 0, 12/16/97 Conduct of Independent Assessment Activities, RMRS 3-B52-IA-003, Revision 3, 9/3/97 Independent Assessments, RMRS-QA-10.01, Revision 0, 11/18/96 Lockout/Tagout, 1-15320-HSP 02.08, Revision 0, 7/12/98

#### **RMRS Personnel Interviewed:**

Barbara Irwin – Building 374 Liquid Waste Operations
Mark Kluherz – Foreman, Building 374 Liquid Waste Operations
Rudi Mastallone – Process Operator, Building 374 Liquid Waste Operations
Ty Vess – Technical Manager, Building 374 Liquid Waste Operations
Carrie Wesley – Building 374 Liquid Waste Operations
Terry Wright - Building 374 Liquid Waste Operations

#### **SSOC Personnel Interviewed:**

Scott Hofstetter – On-Duty Shift Manager, Building 371/374 Facility Operations Paul Sasa – Building 371/374 Facility Engineering Bill Stockho – Building 371/374 Facility Manager

# Exit Meeting Attendees 12/7/98:

George (Larry) Fischer Barbara Irwin Cari McConville Linda Rock Bill Stockho Mitch Thronton Ty Vess Carrie Wesley Terry Wright

#### **Assessment Team:**

George (Larry) Fischer C. M. McConville L. C. Rock Mitch Thornton

# Follow-up:

None planned at this time.